

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VASEK POSPISIL, NICHOLAS KYRGIOS,
ANASTASIA RODIONOVA, NICOLE
MELICHAR-MARTINEZ, SAISAI ZHENG,
SORANA CÎRSTEÀ, JOHN-PATRICK
SMITH, NOAH RUBIN, ALDILA SUTJIADI,
VARVARA GRACHEVA, TENNYS
SANDGREN, and REILLY OPELKA, on
behalf of themselves and all others similarly
situated,

-and-

THE PROFESSIONAL TENNIS PLAYERS
ASSOCIATION,

Plaintiffs,

v.

ATP TOUR, INC., WTA TOUR, INC.,
INTERNATIONAL TENNIS FEDERATION
LTD., and INTERNATIONAL TENNIS
INTEGRITY AGENCY LTD.,

Defendants.

Case No. 1:25-cv-02207-MMG-SDA

ORAL ARGUMENT REQUESTED

**DECLARATION OF LAWRENCE E. BUTERMAN IN SUPPORT OF
DEFENDANT WTA TOUR, INC.'S MOTION TO COMPEL ARBITRATION**

I, Lawrence E. Buterman, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of Latham and Watkins, 1271 Avenue of the Americas, New York, New York, (202) 906-1200, and counsel to Defendant WTA Tour, Inc., (“WTA”) in this action.
2. As a member in good standing in this Court and in the Bar of the state of New York, I submit this Declaration in support of WTA’s Motion to Compel Arbitration, Motion to Stay Proceedings, and Motion to Dismiss. I have personal knowledge of the facts set forth herein and, if called upon to do so, I can and will testify competently thereto.
3. Attached hereto as Exhibit 1 is a true and accurate copy of the 2025 WTA Official Rulebook (“WTA Rulebook”).
4. Attached hereto as Exhibit 2 is a true and accurate excerpt of the Amended and Restated By-Laws of WTA Tour, Inc. (“WTA Bylaws”) dated 2024.
5. Attached hereto as Exhibit 3 is a true and accurate copy of the WTA 2025 Annual Player Form (“Player Form”).
6. Attached hereto as Exhibit 4 is a true and accurate excerpt of the American Arbitration Association’s Commercial Arbitration Rules and Mediation Procedures (“AAA Rule”), available in full here, <https://adr.org/sites/default/files/Commercial%20Rules.pdf>.
7. Attached hereto as Exhibit 5 is a true and accurate excerpt from the WTA 2023 Annual Player Form executed by Plaintiff Sorana Cirstea in June 2023.
8. Attached hereto as Exhibit 6 is a true and accurate excerpt from the WTA 2024 Annual Player Form executed by Plaintiff Sorana Cirstea in June 2024.
9. Attached hereto as Exhibit 7 is a true and accurate copy of the WTA 2025 Annual Player Form executed by Plaintiff Sorana Cirstea in December 2024.

10. Attached hereto as **Exhibit 8** is a true and accurate excerpt from the WTA 2020 Annual Player Form executed by Plaintiff Varvara Gracheva in December 2019.

11. Attached hereto as **Exhibit 9** is a true and accurate excerpt from the WTA 2021 Annual Player Form executed by Plaintiff Varvara Gracheva in February 2021.

12. Attached hereto as **Exhibit 10** is a true and accurate excerpt from the WTA 2023 Annual Player Form executed by Plaintiff Varvara Gracheva in December 2022.

13. Attached hereto as **Exhibit 11** is a true and accurate excerpt from the WTA 2024 Annual Player Form executed by Plaintiff Varvara Gracheva in December 2023.

14. Attached hereto as **Exhibit 12** is a true and accurate copy of the WTA 2025 Annual Player Form executed by Plaintiff Varvara Gracheva in December 2024.

15. Attached hereto as **Exhibit 13** is a true and accurate excerpt from the WTA 2023 Annual Player Form executed by Plaintiff Nicole Melichar-Martinez in January 2023.

16. Attached hereto as **Exhibit 14** is a true and accurate excerpt from the WTA 2024 Annual Player Form executed by Plaintiff Nicole Melichar-Martinez in January 2024.

17. Attached hereto as **Exhibit 15** is a true and accurate copy of the WTA 2025 Annual Player Form executed by Plaintiff Nicole Melichar-Martinez in December 2024.

18. Attached hereto as **Exhibit 16** is a true and accurate excerpt from the WTA 2022 Annual Player Form executed by Plaintiff Anastasia Rodionova in March 2022.

19. Attached hereto as **Exhibit 17** is a true and accurate excerpt from the WTA 2021 Annual Player Form executed by Plaintiff Aldila Sutjiadi in February 2021.

20. Attached hereto as **Exhibit 18** is a true and accurate copy of the WTA 2023 Annual Player Form executed by Plaintiff Aldila Sutjiadi in December 2022.

21. Attached hereto as **Exhibit 19** is a true and accurate excerpt from the WTA 2024 Annual Player Form executed by Plaintiff Aldila Sutjiadi in February 2024.

22. Attached hereto as **Exhibit 20** is a true and accurate copy of the WTA 2019 Annual Player Form executed by Saisai Zheng in December 2018.

23. Attached hereto as **Exhibit 21** is a true and accurate copy of the WTA 2020 Annual Player Form executed by Saisai Zheng in December 2019.

24. Attached hereto as **Exhibit 22** is a true and accurate copy of the WTA 2021 Annual Player Form executed by Saisai Zheng in December 2020.

25. Attached hereto as **Exhibit 23** is a true and accurate copy of the WTA 2023 Annual Player Form executed by Saisai Zheng in December 2022.

26. Attached hereto as **Exhibit 24** is a true and accurate excerpt from the WTA 2024 Annual Player Form executed by Saisai Zheng in December 2023.

27. Attached hereto as **Exhibit 25** is a true and accurate excerpt from the WTA 2025 Annual Player Form executed by Saisai Zheng in December 2024.

28. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 20, 2025.

Dated: May 20, 2025
New York, New York

/s/ Lawrence E. Buterman
Lawrence E. Buterman